

JAP:RMT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M10-1073

- - - - -X

UNITED STATES OF AMERICA

- against -

JONATHAN MORA,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER McKELVY, being duly sworn, deposes and says that he is a Special Agent with United States Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about September 15, 2010, within the Eastern District of New York and elsewhere, the defendant JONATHAN MORA did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

PRE-ARRAIGNMENT
C O M P L A I N T
(21 U.S.C. §§ 952(a)
and 960)

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. At approximately 6 p.m. on September 15, 2010, defendant JONATHAN MORA arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard JetBlue Flight No. 886 from Cancun, Mexico.


2. During a baggage examination, a Customs and Border Protection inspector noticed that the defendant JONATHAN MORA appeared unusually nervous.

3. After further questioning, the defendant JONATHAN MORA admitted to having swallowed foreign bodies. He was presented with an x-ray consent form, which he read, appeared to understand and signed. MORA was transported to a medical facility at JFK where an x-ray was taken of his intestinal tract, which was positive for foreign bodies. At approximately 9:30 p.m., MORA passed five pellets, one of which field-tested positive for the presence of heroin. MORA was then placed under arrest.

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

4. The defendant JONATHAN MORA will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that the defendant JONATHAN MORA be dealt with according to law.


CHRISTOPHER MCKELVEY
Special Agent
Immigration and Customs
Enforcement

Sworn to before me this
16th day of September, 2010
